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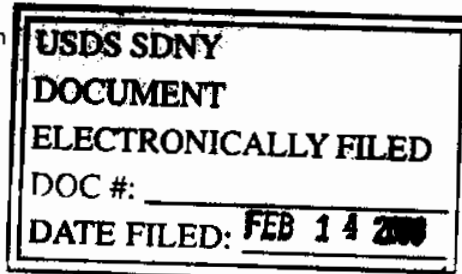
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January 23, 2008

VIA E-MAIL

Honorable Paul A. Crotty
 United States District Judge
 United States District Court
 Southern District of New York
 500 Pearl Street, Room 735
 New York, NY 10007

Re: *Ario v. Axiom International, Inc. d/b/a Axiom
 Entertainment Services, Inc.,
 SDNY Case No. 07 Civ. 6486*

Dear Judge Crotty:

On behalf of plaintiff Joel S. Ario, Acting Insurance Commissioner of the Commonwealth of Pennsylvania, in his capacity as Liquidator of Reliance Insurance Company ("Reliance"), we respectfully request a pre-motion conference prior to filing a motion for leave to amend the complaint pursuant to Fed. R. Civ. P. 15(a). A copy of the proposed amended complaint is submitted herewith.

The amendment seeks to correct a mistake in the original complaint that has come to light through discovery and investigation. When we filed the original complaint, we sued Axiom International, Inc. ("Axiom Int'l") "doing business as" Axiom Entertainment Services, Inc. ("Axiom Entertainment"). However, we learned through discovery that Axiom Int'l was not even in existence when Reliance issued the underlying policies to Axiom Entertainment. Further, discovery and investigation have shown that Axiom Entertainment was never an incorporated entity but was merely a name of the business being conducted by its principals, Lynn White, Ruben Rodriguez and Barry Kay. The proposed amended complaint therefore seeks to drop Axiom Int'l and add White, Rodriguez and Kay as defendants doing business as Axiom Entertainment. The proposed claims against these individuals are not affected by the automatic stay caused by Axiom's bankruptcy filing.

February 13, 2008
The Rule 15(a) motion is
granted and the Amended
Complaint should be served.
Upon service of the Complaint on
the named defendants, a conference
will be held.
So ordered
Paul M. Kelly

NYC:751215.2

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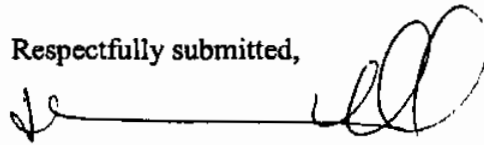
MEMO ENDORSED**MEMO ENDORSED**

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In addition, the proposed amended complaint seeks to add a successor liability claim against an Axiom entity that was not named in Axiom's bankruptcy petition – Axiom ASP, Inc. ("Axiom ASP") – because discovery has shown that Axiom ASP took over the business previously conducted by White, Rodriguez and Kay, continuing the same services, using the same employees, and using the same offices and telephone numbers.

As the Court knows, Fed. R. Civ. P. 15(a) provides that the Court "should freely give leave" to amend "when justice so requires." We respectfully submit that justice so requires in the case at bar. Accordingly, we respectfully request a pre-motion conference prior to filing a motion for leave to amend the complaint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jill L. Mandell", with a long horizontal line extending to the left.

Jill L. Mandell
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

cc: Ronald A. Peters, Esq.